



**TOM DALY**  
CLERK-RECORDER

PROPERTY RECORDS  
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FICTITIOUS BUSINESS NAMES  
NOTARY REGISTRATION  
ORANGE COUNTY ARCHIVES

Nov. 21, 2011

Secretary of State Debra Bowen  
1500 11th Street  
Sacramento, California 95814

Subject: Comments in response to proposed final revisions to Title 2, Division 7,  
Chapter 15: Trustworthy Electronic Document or Record Preservation

Dear Secretary of State Bowen,

Thank you for the opportunity to comment on the proposed additional revisions to Section 22620.1 of Title 2 of the California Code of Regulations (Trustworthy Electronic Document or Record Preservation).

The latest revisions (released Nov. 7, 2011) further satisfy concerns my office has shared over the past three years regarding the scope and timing of these regulations on local government agencies.

Specifically, thank you for clarifying that these regulations are recommendations not mandates, and that they represent "best practice" guidelines. This provides local government with the appropriate flexibility to ultimately determine what constitutes trustworthy preservation systems given individual circumstances.

Again, we have appreciated the opportunity to work with your staff to communicate concerns about the proposed regulations. My office will continue to work with the Secretary of State on ways to best protect the integrity of public records.

Sincerely,

Tom Daly  
Orange County Clerk-Recorder

cc/ Bill Campbell, Chair, Orange County Board of Supervisors  
Tom Mauk, CEO, County of Orange  
Webster Guillory, Orange County Assessor

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